

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MERRILL STEINBERG, Individually and
On Behalf of All Others Similarly Situated,
Plaintiff,

v.

ERICSSON LM TELEPHONE CO.,
CARL-HENRIC SVANBERG and KARL-
HENRIK SUNDSTROM,
Defendants.

Civil Action No. 07-CIV-9615

Judge Robert P. Patterson

**DECLARATION OF
Joshua D. Kaye**

JOSHUA D. KAYE declares pursuant to 28 U.S.C. § 1746:

1. I am an associate at the law firm of Paul, Weiss, Rifkind, Wharton & Garrison LLP, counsel to Carl-Henric Svanberg, Karl-Henrik Sundstrom, and Ericsson LM Telephone Co. in the above-captioned matter. I respectfully submit this declaration in support of their Motion to Dismiss the Amended Complaint (the “Motion to Dismiss”).

2. Attached as Exhibit A is a true and correct copy of Plaintiffs’ Consolidated Complaint, dated April 15, 2008.

3. Attached as Exhibit B is a true and correct copy of Ericsson LM Telephone’s 2007 Form 20-F Annual Report, filed April 21, 2008.

4. Attached as Exhibit C is a true and correct copy of the transcript of the Ericsson Strategy and Technology Summit held in London on September 11, 2007.

5. Attached as Exhibit D is a true and correct copy of the slides accompanying Carl-Henric Svanberg’s presentation at the Ericsson Strategy and Technology Summit held in London on September 11, 2007.

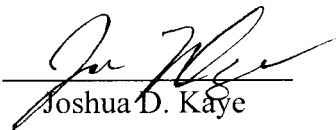
6. Attached as Exhibit E is a true and correct copy of the slides accompanying Karl-Henrik Sundstrom's presentation at the Ericsson Strategy and Technology Summit held in London on September 11, 2007.

7. Attached as Exhibit F is a true and correct copy of Alcatel-Lucent's 2006 Form 20-F Annual Report, filed April 6, 2007.

8. Attached as Exhibit G is a true and correct copy of an article entitled *Alcatel in Danger of Losing AT&T Role*, by Peggy Hollinger, *et. al.*, published in the FINANCIAL TIMES on October 5, 2007.

9. I hereby declare under penalty of perjury that the foregoing is true and correct.

Executed on June 13, 2008.


Joshua D. Kaye